

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DANIEL KAMEN,
Defendant.

)
)
)
)
)
)
)

CRIM. NO. 04-10384-PBS

GOVERNMENT'S FURTHER SUMMARY OF TESTIMONY TO
BE OFFERED UNDER FED. R. EVID. 702

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, pursuant to Fed. R. Crim. P. 16(a)(1)(E) and (b)(1)(C), respectfully submits this summary of expert testimony it expects to elicit at trial and the qualifications of the testifying witness.

1. Celeste R. Wilson, M.D.

A. Summary of Anticipated Testimony

Dr. Celeste R. Wilson, M.D., is a physician currently employed by Children's Hospital in Boston, Massachusetts, who has specialized in various aspects of pediatric medical care since becoming an M.D. in 1995. Dr. Wilson will view the images found on the videotapes in the current matter and express her opinion as to the approximate age of the individuals seen on the videotapes (and that they appear to her to be minors of an approximate age), as well as her expert opinion that the images reveal what appear to her to be actual human beings.

B. Summary of Witness Qualifications and Bases for Opinions

Dr. Celeste Wilson is a recognized pediatric physician who has previously been qualified as an expert in similar matters. She has a Bachelor of Arts degree from Harvard University (1991) and an M.D. from Columbia University-College of Physicians and Surgeons (1995). Her post-doctoral education includes a Fellowship (Academic/Developmental-Behavioral Pediatrics) at Children's Hospital in Boston (1998-2001), a Residency in Pediatrics at Children's Hospital in Boston (1996-1998) and an Internship in Pediatrics at Children's Hospital in Boston (1995-

1996). Her professional appointments include being named the “Director of Pediatric Urgent Care” at Holy Family Hospital in Metheun, Massachusetts (2002-2003), “Assistant in Medicine” at Children’s Hospital in Boston (2001 to present) and an “Instructor in Pediatrics” at Harvard Medical School in Boston (2001 to present). Dr. Wilson was also appointed “Associate Investigator, Center for Adolescent Substance Abuse Research” at Children’s Hospital in Boston (2000).

Dr. Wilson has held numerous committee assignments (public and private) including that of “Medical Reviewer” of the Child Fatality Review Team for the Norfolk County District Attorney’s Office in Canton, Massachusetts (2003 to present) and “Pediatric Peer Reviewer” of the UpToDate-Medical Resource Online in Wellesley, Massachusetts (2004 to present). Dr. Wilson has served on the Board of Governors for the Medical Review Journal at Columbia University-College of Physicians and Surgeons in New York, New York (1993-1995) and on the Committee on Guidelines for Reporting Sexual Assault at Columbia University-College of Physicians and Surgeons in New York, New York (1993), among other committee assignments.

Dr. Wilson is a member of the following professional societies: the Association for Medical Education and Research in Substance Abuse, the American Professional Society on the Abuse of Children, the Ambulatory Pediatric Association, the Association for Medical Education and Research in Substance Abuse and the American Academy of Pediatrics.

Dr. Wilson has received numerous awards and honors for her medical efforts and has taught dozens of courses and published multiple presentations relative to her pediatric specialty (provided in full resume to defendant through his counsel).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

March 7, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorneys for defendant Daniel Kamen, on March 7, 2006, via electronic filing.

/s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

March 7, 2006